

*Honorable J. Dodge  
Robert E. Gerber*

United States Bankruptcy Court  
Southern District of New York  
One Bowling Green  
New York, N.Y. 10004-1408

**Lead Case # 09-50026**

In Re:	)	
	)	Chapter 11
MOTORS LIQUIDATION COMPANY, et. al	)	<u>Case # 09-0950026</u>
	)	(Gerber)
Debtors	)	Jointly Administered
(formerly General Motors Corp. et. al.)	)	August 12, 2009
<hr/>		
Official Committee of Unsecured Creditors of Motors	)	Adversory Proceeding
Liquidation Company f/k/a General Motors Corporation	)	Case # 09-_____
	)	
Plaintiff	)	
against	)	
	)	
J.P. Morgan Chase Bank, N.A. et al.	)	
	)	
Defendant	)	
	)	<b>Dated August 12, 2009</b>

---

**PERMISSION REQUESTED**

TO FILE AMICUS CURIE BRIEF(S), BY CREDITOR R.R.M. NARUMANCHI ("Interested Party")  
on the 7-31-2009 Adverse Complaint filed by Official Committee of Unsecured Creditors  
of Motor Liquidation Company f/k/a General Motors Corporation (**Docket # 3593**)

Comes now Radha R.M. Narumanchi, a so-called unsecured bondholder and creditor in the lead case <sup>1</sup>, **who would like to hereby request that he be granted advance permission by this honorable court to let him file amicus curie briefs**, in this adversarial proceedings, at appropriate times, for, as an auditor<sup>2</sup>, he has a **totally different perspective** on the events that lead to defendant J.P. Morgan Chase filing the UCC forms 1 and 4, on 11-30-2006 and 10-30-2008, respectively, for the term loan in the amount of \$1.5 billion, and its impact and effect on the status of all so-called unsecured bondholders.

Respectfully submitted.

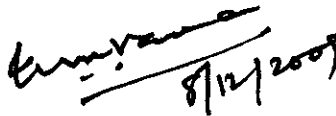
Dated at New Haven, Conn. 06513, this 12<sup>th</sup> day of August, 2009.

---

<sup>1</sup>And also a Plaintiff in an adversary proceeding, in this case, in addition to being an appellant against this Court's decision on Section 363 Sale.

<sup>2</sup> [An ICWA (India); A Corporate Secretary (14/16 papers) (India); an ICMA (14/16 papers) from the United Kingdom; and a CPA (NY) since 1975, with 58 years of experience in business and government since 1951, and 34 years of teaching experience since 1975 in the USA]

CREDITOR ("Interested Party")



(Radha R.M. Narumanchi)  
657 Middletown Avenue  
New Haven, Conn. 06513  
Phone: (203) 562-0536  
Email: [rrm\\_narumanchi@hotmail.com](mailto:rrm_narumanchi@hotmail.com)

**Certification**

This is to certify that a copy of the aforementioned was mailed by first class mail, postage paid this 12th day of August, 2009 to:

- 1) Weil, Gotshal & Manges LLP, Attorneys for Debtors, 767 Fifth Avenue, New York, N.Y. 10153 - Attn: Harvey R. Miller/Stephen Karotkin/Joseph H. Smolinsky;
- 2) Cadwalader, Wickersham & Taft LLP, Attorneys for the Purchaser, One World Financial Center, New York, N.Y. 10281 - Attn: John J. Rapisardi;
- 3) Kramer Levin Naftalis & Frankel LLP, Attorneys for the Creditors Committee, Attorneys for the Creditors Committee, 1177 Avenue of the Americas, New York, N.Y. 10036, Attn: Kenneth H. Eckstein;
- 4) Cleary Gottlieb Steen & Hamilton LLP, Attorneys for the UAW, One Liberty Plaza, New York, N.Y. 10006 - Attn: James L. Bromley;
- 5) Cohen, Weiss and Simon LLP, Attorneys for the UAW, 330 West 42<sup>nd</sup> Street, New York, N.Y. 10036 - Attn: Babette Ceccotti;
- 6) Vedder Price, P.C., Attorneys for Export Development Canada, 1633 Broadway - 47<sup>th</sup> Floor, New York, N.Y. 10019 - Attn: Michael J. Edelman/Michael L. Schein;
- 7) Office of the United States Trustee for the Southern District of New York, 33 Whitehall Street, 21<sup>st</sup> floor, New York, N.Y. 10004 - Attn: Diana G. Adams;
- 8) U.S. Attorney's General Office, S.D.N.Y., 86 Chambers Street - Third Floor, New York, N.Y. 10007 - Attn: David S. Jones/Matthew L. Schwartz;
- 9) The Coleman Law Firm, 77 West Wacker Drive, Suite 4800. Chicago, Ill. 6060, Attn: Steve Jakubowski/Elizabeth Richert;
- 10) Butzel Long, Special Counsel to Official Committee of Unsecured Creditors, 380 Madison Avenue, 22<sup>nd</sup> floor, New York, N.Y. 10017. Attn: Eric B. Fisher/Barry N. Seidel;
- 11) JP Morgan Chase Bank, N.A., P.O. Box 2558, Houston, Texas 77252; and
- 12) Courtesy Copy to the Chambers of Honorable Judge Robert E. Gerber, United States Bankruptcy Court, Southern District of New York, One Bowling Green, New York, N.Y. 10004-1408



(Radha R.M. Narumanchi)